

Dee May
Executive Director
Federal Regulatory



1300 I Street N.W., Floor 400W
Washington, DC 20005

Phone 202 515-2529
Fax 202 336-7922
dolores.a.may@verizon.com

July 6, 2001

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

*RE: Application by Verizon New York Inc. for Authorization To Provide In-Region,
InterLATA Services in State of Connecticut, Docket No. 01-100*

Dear Ms. Salas:

In response to requests from Ms. Attwood and the CCB staff, Verizon is providing the enclosed. Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 01-1063.

Sincerely,

A handwritten signature in cursive script that reads "Dee May".

Enclosures

cc: C. Pabo
K. Farroba
D. Attwood
B. Olson
M. Carey
A. Johns
S. Pie
J. Nitsche
J. Jackson

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Ex Parte

Ms. Dorothy Attwood
Chief, Common Carrier Bureau
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

*RE: Application by Verizon New York Inc. for Authorization To Provide In-Region,
InterLATA Services in State of Connecticut, Docket No. 01-100*

Dear Ms. Attwood:

This letter responds to Staff's request for information about Verizon's plans to provide resold DSL over resold voice lines. As Verizon explained in its Application, Verizon Advanced Data Inc. (VADI) does not have an obligation to make its DSL service available for resale where other carriers are providing the voice service on the line. Application at 54. Nevertheless, in the state of Connecticut, VADI will voluntarily make available such a service for resale, called "Verizon DSL over Resold Lines," as described below, effective July 16, 2001. This offering is contingent on the Commission's grant of Special Temporary Authority, as requested in a separate letter being filed today, for relief from the conditions in the Bell Atlantic/GTE Merger Order.¹ This is an interim arrangement until a more permanent arrangement can be developed through collaboratives and the change management process.

Attached to this letter is an illustrative tariff for this service. A final tariff will be filed to be effective July 16, 2001. As is described more specifically there, this offering will enable resellers of Verizon's voice service to offer to their end users resold DSL on existing resold voice lines where facilities are available that are suitable for use to provide VADI's DSL service.

Resellers will pre-order and order Verizon DSL over Resold Lines for existing resold voice lines using the existing interfaces (either FTP or VADI's graphical user interface) that VADI makes available to its ISP customers. In turn, VADI will provide resellers with the same notices it provides to its other ISP customers. Finally, VADI will bill resellers for Verizon DSL over

¹ *GTE Corp.*, 15 FCC Rcd 14032, App. D (2000).

Resold Lines using the same mechanisms that it uses to bill its ISP customers. Because these systems and processes are different than those used by Verizon for resale of its services, and because additional steps are required to turn-up the service, this service will be excluded from all reported performance measurements. (Resellers will continue to pre-order and order voice lines for resale as they do today, using the Web GUI, CORBA, or EDI interfaces Verizon provides to CLECs and resellers. For resold voice lines, Verizon will continue to provide notifiers and to bill resellers as it does today.)

As shown in the attached illustrative tariff, there will be both recurring and non-recurring charges for this service. The recurring charges will be VADI's single line month-to-month charge for DSL service, minus the applicable resale discount in Connecticut. At present, the non-recurring charges will be VADI's existing tariffed non-recurring charges (as applicable), minus the applicable resale discount in Connecticut. VADI may in the future seek an additional non-recurring charge because the existing non-recurring charges likely do not fully capture the costs of providing this new service.

If you have any questions, please do not hesitate to call. The twenty page limit does not apply as set forth in DA 01-106.

Sincerely,

A handwritten signature in black ink, appearing to read "Dee May". The signature is fluid and cursive, with the first name "Dee" and last name "May" clearly distinguishable.

Attachment

cc: C. Pabo
K. Farroba
D. Attwood
B. Olson
M. Carey
A. Johns
S. Pie
J. Nitsche
J. Jackson

COMMUNICATIONS SERVICES TARIFF

SECTION 5 - DESCRIPTION OF DATA SERVICES AND RATES (Continued)
PART III

5.2 Verizon DSL Over Resold Lines

This service is offered over resold voice lines that terminate on end user premises in the following state: Connecticut.

Verizon DRL is available only to carriers that have an existing resold voice line and seek to engage in the resale of voice and data on a combined basis pursuant to 47 U.S.C. §251(c)(4). Consequently, for purposes of this service, the term "customer" is defined as a telecommunications carrier that resells voice services pursuant to 47 U.S.C. § 251(c)(4).

5.2.1 Service Description

- A. Verizon DSL Over Resold Lines (DRL) is a data access service. It uses DSL technology to transport data over compatible copper facilities that are concurrently used to provide resold voice services to the same end user premises. Data traffic generated by a customer-provided modem is transported to the Verizon DRL Connection Point. From there, the traffic is transported to the end user's information service provider (ISP) or content provider via other Company services.

Issued: Illustrative 7/X/01

Effective:

by:

John S. Cullina
Secretary and General Counsel
Arlington, VA 22201

COMMUNICATIONS SERVICES TARIFF

SECTION 5 - DESCRIPTION OF DATA SERVICES AND RATES (Continued)
PART III**5.2 Verizon DSL Over Resold Lines (Continued)****5.2.1 Service Description (Continued)**

B. Six types of Verizon DRL are available based on the upstream and downstream speed combinations chosen by the customer.

1. Verizon DRL 768K/128K provides maximum speeds of 768 Kilobits Per Second (Kbps) downstream and 128 Kbps upstream.
2. Verizon DRL 1.5M/384K provides maximum speeds of 1.544 Megabits per second (Mbps) downstream and 128 Kbps upstream.
3. Verizon DRL 1.5M/384K provides maximum speeds of 1.544 Mbps downstream and 384 Kbps upstream.
4. Verizon DRL 7.1M/768K provides maximum speeds of 7.1 Mbps downstream and 768 Kbps upstream.
5. Verizon DRL 384K/384K provides maximum speeds of 384 Kbps downstream and 384 Kbps upstream.
6. Verizon DRL 768K/768K provides maximum speeds of 768 Kbps downstream and 768 Kbps upstream.

The data speeds listed above are maximum speeds. Actual speeds may be lower due to the impact of loop distance, modem technology and other factors. Therefore, performance levels cannot be guaranteed. This includes data speeds, throughput, and packet loss.

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COMMUNICATIONS SERVICES TARIFF

SECTION 5 - DESCRIPTION OF DATA SERVICES AND RATES (Continued)
PART III**5.2 Verizon DSL Over Resold Lines (Continued)****5.2.2 Terms and Conditions**

- A. Verizon DRL is available only where suitable facilities are available to an end user premises.
- B. Company will provision and maintain Verizon DRL from the Verizon DRL Connection Point to the network interface device at the designated end user premises. Company will advise Customer of any additional equipment necessary to support Verizon DRL. Customer is responsible for obtaining the necessary additional equipment, including any required splitters or filter and a compatible DSL modem.
- C. Customer will provide the Company with the necessary information (e.g., name and address/location, telephone number of the resold voice circuit, , serving area, etc., related to end user and ISP/Content Provider) to provision Verizon DRL.
- D. Verizon DRL will be provisioned over copper facilities where such facilities are available that are suitable for the service and over which Customer is also providing resold voice service pursuant to 47 U.S.C. §251(c)(4); Customer must provide resold voice service to the same end user premises over such facility at the time of ordering Verizon DRL. Verizon DRL will be disconnected if Customer no longer provides resold voice service over such facility.
- E. Company will obtain qualification information on facilities to determine the suitability of such facilities for Verizon DRL. Company will not provide Verizon DRL on facilities that are unsuitable for the service, nor will Company provide Verizon DRL if it determines that such provision will produce interference to other services.
- F. Verizon DRL will be provided subject to the availability and limitations of Company facilities and related equipment.
- G. Company reserves the right to interrupt temporarily Verizon DRL for maintenance, software upgrades, and in emergency situations.
- H. Customer will obtain from the end user authorization to provide Verizon DRL over that end user's voice line, and to allow Company employees or its authorized agents to enter end user's designated premises at any reasonable hour for the purpose of installing, inspecting, or repairing Verizon DRL arrangement. Customer will also obtain permission from the end user, upon termination of Verizon DRL, to allow Company employees or its authorized agents to enter the premises at a reasonable hour to remove any Company equipment. Customer will present evidence of such authorizations to the Company upon request. Company may terminate Verizon DRL in the event such authorizations are not obtained and maintained.

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Effective:

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Secretary and General Counsel
Arlington, VA 22201

COMMUNICATIONS SERVICES TARIFF

SECTION 5 - DESCRIPTION OF DATA SERVICES AND RATES (Continued)
PART III

Verizon DSL Over Resold Lines (Continued)

5.2.3 Rate Regulations

- A. Monthly Rate - A monthly recurring charge applies for each Verizon DRL arrangement.
- B. Service Activation - A nonrecurring charge applies for the initial service activation associated with each Verizon DRL arrangement ordered.
- C. ISP/Content Provider Charge - A nonrecurring charge also applies for activities associated with a change in ISP/Content Provider for each Verizon DRL arrangement changed.
- D. Speed Change Downward - A nonrecurring charge applies for activities associated with a downward change in speed from one service type to another with each Verizon DRL arrangement changed.
- E. Speed Change-Upward - There is not a charge applied for activities associated with an upward change in speed from one service type to another service type.
- F. Software Change - A nonrecurring charge applies for a software change associated with the remapping of circuit information or other software changes associated with a Verizon DRL arrangement. This charge is applied on a per software change basis.

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Secretary and General Counsel
Arlington, VA 22201

COMMUNICATIONS SERVICES TARIFF

SECTION 5 - DESCRIPTION OF DATA SERVICES AND RATES (Continued)
PART III**Verizon DSL Over Resold Lines (Continued)****5.2.4 Rates and Charges****A. Month-to-Month ***

	<u>Monthly Rate</u>
Verizon DRL 768K/128K	\$ 39.95
Verizon DRL 1.5M/128K	43.95
Verizon DRL 1.5M/384K	48.95
Verizon DRL 7.1M/768K	109.95
Verizon DRL 384K/384K	46.00
Verizon DRL 768K/768K	80.00

B. Nonrecurring Charges *

1. Service Activation	\$ 60.00
2. ISP/Content Provider Change	60.00
3. Speed Change - Downward	35.00
4. Speed Change - Upward	00.00
5. Software Change	6.00

* Rates are subject to any appropriate wholesale discount established in the state pursuant to 47 U.S.C. §251(c)(4).

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